

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

INTELLECTUAL VENTURES I LLC and
INTELLECTUAL VENTURES II LLC,

Plaintiffs,

v.

SOUTHWEST AIRLINES CO.,

Defendant.

Civil Action No. 7:24-cv-00277-ADA

JURY TRIAL DEMANDED

**JOINT MOTION FOR LEAVE TO FILE
SUPPLEMENTAL OPPOSITION TO DEFENDANT’S MOTION TO SEVER AND STAY**

Plaintiffs Intellectual Ventures I LLC and Intellectual Ventures II LLC (“IV”) and Defendant Southwest Airlines Co.’s (“Southwest”) (collectively, the “Parties”) move pursuant to Rules 15 and 16 of the Federal Rules and Civil Procedure for leave for IV to file a supplemental brief in support of its opposition to Southwest’s Motion to Sever and Stay Claims Against In-Flight Connectivity Systems Based on the Customer-Suit Exception and for Southwest to file a response.

On February 12, 2025, Southwest filed its Motion to Sever and Stay Claims Against In-Flight Connectivity Systems Based on the Customer-Exception. Dkt. 17. On February 19, 2025, IV filed its Opposition to Defendant’s Motion to Sever and Stay Claims Against In-Flight Connectivity Systems Based on the Customer-Suit Exception. Dkt. 18. On February 26, 2025, Southwest filed its Reply in Support of its Motion. Dkt. 20.

On February 25, 2025, IV submitted a discovery dispute to the Court, in which IV requested limited discovery related to Southwest’s Motion to Sever and Stay, including: (1) a four-hour deposition of Southwest related to the customer suit arguments and the declaration submitted from

Christopher Muhich, (2) 5 Requests for Production, and (3) 5 Interrogatories. Ex. A. On March 6, 2025, the Court granted a two-hour deposition of Southwest related to the customer suit arguments and the declaration submitted from Christopher Muhich, 5 Requests for Production, and 5 Interrogatories. Ex. B. IV served its deposition notice, requests for production and interrogatories on March 14, 2025. On May 13, 2025, IV took the deposition of Christopher Muhich, regarding Southwest's Motion to Sever and Stay based on the customer suit exception. Accordingly, IV seeks to file a supplemental brief in support of its opposition to Southwest's Motion to Sever and Stay Claims and Southwest seeks to file a response as follows:

Item	Proposed Deadline
IV's Supplemental Brief	June 12, 2025
Southwest's Response	June 26, 2025

The Parties agree to a limit of seven pages for both submissions.

Accordingly, the Parties respectfully requests the Court grant its Joint Motion for Leave for IV to file a supplemental brief and for Southwest to file a response.

Dated: June 9, 2025

RESPECTFULLY SUBMITTED,

By: /s/ Jonathan K. Waldrop
 Jonathan K. Waldrop (CA Bar No. 297903)
 (Admitted in this District)
 jwaldrop@kasowitz.com
 Darcy L. Jones (CA Bar No. 309474)
 (Admitted in this District)
 djones@kasowitz.com
 Marcus A. Barber (CA Bar No. 307361)
 (Admitted in this District)
 mbarber@kasowitz.com
 John W. Downing (CA Bar No. 252850)
 (Admitted in this District)
 jdowning@kasowitz.com

Heather S. Kim (CA Bar No. 277686)
(Admitted in this District)
hkim@kasowitz.com
ThucMinh Nguyen (CA Bar No. 304382)
(Admitted in this District)
tnguyen@kasowitz.com
Jonathan H. Hicks (CA Bar No. 274634)
(Admitted in this District)
jhicks@kasowitz.com
KASOWITZ BENSON TORRES LLP
333 Twin Dolphin Drive, Suite 200
Redwood Shores, California 94065
Telephone: (650) 453-5170
Facsimile: (650) 453-5171

Paul G. Williams (GA Bar No. 764925)
(Admitted in this District)
pwilliams@kasowitz.com
KASOWITZ BENSON TORRES LLP
333 Twin Dolphin Drive, Suite 200
Redwood Shores, California 94065
Telephone: (650) 453-5170
Facsimile: (650) 453-5171

Jeceaca An (NY Bar No. 5849898)
(Admitted in this District)
jan@kasowitz.com
KASOWITZ BENSON TORRES LLP
1633 Broadway
New York, New York 10019
Telephone: (212) 506-1700
Facsimile: (212) 506-1800

Mark D. Siegmund (TX Bar No. 24117055)
msiegmund@cjsjlaw.com
Cherry Johnson Siegmund James PLLC
7901 Fish Pond Rd., 2nd Floor
Waco, Texas 76710
Telephone: 254-732-2242
Facsimile: 866-627-3509

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was served or delivered electronically to all counsel of record on this 9th day of June, 2025, via the Court's CM/ECF system.

/s/ Jonathan K. Waldrop
Jonathan K. Waldrop